

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**MICHAEL CORY JENKINS and
EDDIE TERRELL PARKER**

PLAINTIFFS

v.

CIVIL ACTION NO.: 3:23-cv-00374

RANKIN COUNTY, MISSISSIPPI, et al.

DEFENDANTS

MOTION TO WITHDRAW AS COUNSEL

Jeffery P. Reynolds, counsel for Defendant Daniel Opdyke in the above-styled and numbered cause of action, moves the Court under Uniform Local Civil Rule 83.1(b)(3) for an Order withdrawing undersigned as counsel of record for Defendant Opdyke. In support, undersigned states the following:

1. On October 2, 2023, at around 6:15 p.m., undersigned filed a Notice of Appearance as counsel for John Doe Defendant Daniel Opdyke. Undersigned entered his appearance in order to take part in a mediation between Plaintiffs and Defendants scheduled for this Thursday, October 5, 2023, before the Honorable Magistrate Judge Keith Ball.

2. Around one hour later (at 7:20 p.m. CST), the insurance carrier defending Mr. Opdyke sent undersigned an email advising that the insurance carrier would cease providing Defendant Opdyke (and certain other Defendants) with defense and indemnity in this action, effective tomorrow.

3. Given the insurance carrier's decision, undersigned and his law firm can no longer defend Mr. Opdyke, and request an Order permitting their withdrawal as counsel for Defendant Opdyke.

4. Defendant Opdyke will suffer no prejudice by undersigned's withdrawal as counsel. Defendant Opdyke has not been served with Process and is facing no deadlines or any other time-sensitive matters. He is incarcerated, insolvent, and unable to pay any money toward a potential judgment in this matter.

5. Consequently, undersigned respectfully requests an Order granting him permission to withdraw as counsel of record for Defendant Daniel Opdyke.

6. Given the basic nature of the relief requested herein, undersigned further requests that he be excused from Uniform Local Civil Rule 7(b)(4)'s requirement that this motion be accompanied by a memorandum of law.

WHEREFORE, attorney Jeff Reynolds respectfully requests that the Court excuse him from Uniform Local Civil Rule 7(b)(4)'s memorandum brief requirement and issue an Order withdrawing him as Defendant Daniel Opdyke's counsel of record.

Respectfully submitted, this 2nd day of October 2023.

s/ Jeffery P. Reynolds
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CERTIFICATE OF SERVICE

I, Jeffery P. Reynolds, certify that on this day the above and foregoing was filed electronically with the Clerk of the Court using the Court's CM/ECF system, which will send notification to all counsel of record.

I further certify that, on this day, I have prepared correspondence and a copy of this motion, which will be sent via the United States Postal Service, postage prepaid, to Daniel Opdyke at his current place of incarceration, which location is nonpublic information.

So certified: October 2, 2023.

s/ Jeffery P. Reynolds

Jeffery P. Reynolds